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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION FOR RELIEF FROM  
NONDISPOSITIVE PRETRIAL ORDER OF  
MAGISTRATE JUDGE**

This Document Relates to:

ALL MATTERS

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

**[PROPOSED] ORDER**

Before the Court is Defendants Uber Technologies, Inc., Raiser LLC, and Raiser-CA, LLC's (collectively, "Defendants") Motion For Relief from the Nonpositive Pretrial Order of Magistrate Judge Cisneros. Having considered Defendants' motion and good cause having been found, the Court grants the Motion as follows:

This Court's March 24, 2025 Order (Dkt. No. 2600) Granting in Part and Denying in Part Defendants' Motion for Protective Order Barring Apex Depositions is set aside as applied to Dara Khosrowshahi and Jill Hazelbaker, and Uber's request to prevent the depositions of Mr. Khosrowshahi and Ms. Hazelbaker is GRANTED.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE